

### Remarks

Claims 1-5, 16, 21, and 22 are pending in the application. Claims 1, 2, 16, and 21 have been amended. The title of the invention has been amended to correct a minor typographical error. Accordingly, no new matter has been added.

**Claims 1-5 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chen (US 20010007521) (hereinafter "Chen") in view of Lai et al. US 2002/0089017 (hereinafter "Lai").**

As discussed in prior responses and admitted in the Office Action, Chen does not disclose the control circuit as recited in claim 1. The Examiner has relied upon Lai to provide what is missing from Chen, namely the control circuit. However, Lai fails to disclose a control circuit "to change a first holding voltage of the SCR to a second holding voltage less than the power supply voltage to keep the SCR in latch-up for a time period between 150ns and 500ns in response to detecting an ESD event." as recited in claim 1 and supported in the specification. Lai is silent as to any specific number or range for the time period, much less a range at the nanosecond level. Lai specifically discloses the RC time delay must be at "a level of microsecond [*sic*]" because its circuit has to discern between an ESD event and power-on. See Lai at [0048].

In sum, neither Chen nor Lai alone or in combination with any of the art of record discloses a control circuit that includes an RC (resistor-capacitor) circuit to provide the time period between 150ns and 500ns to keep the SCR from latching-up as recited in claim 1, thus, claim 1 and all claims dependent therefrom are patentable over the art of record.

**Claims 16, 21 and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lee et al. in view of Lai et al. as applied to claims 1, 8 & 23 above, and further in view of Tong et al. (US 6,756,834).**

It is respectfully assumed by the applicant the Examiner made a typographical error in citing "Lee et al." and meant Chen as cited with respect to claim 1. Claim 16 includes the same limitation of claim 1, namely, "to change a first holding voltage of the SCR to a second holding voltage less than the power supply voltage to keep the SCR in latch-up for a time period between

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150ns and 500ns in response to detecting an ESD event." Therefore as argued above, neither Chen nor Lai alone or in combination disclose this limitation. Adding what is disclosed in Tong fails to provide what is missing from Chen and Lai. Tong does not disclose any relevant values or ranges with respect to the time period associated with the control circuit of claim 16. Therefore, claim 16 and all claims dependent therefrom are patentable over the art of record.

### Conclusion

Having tendered the above remarks and amended the claims as indicated herein, Applicants respectfully submit that all rejections have been addressed and that the claims are now in a condition for allowance, which is earnestly solicited.

Should the Examiner have further questions or comments with respect to examination of this case, it is respectfully requested that the Examiner telephone the undersigned so that further examination of this application can be expedited.

Respectfully submitted,



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